

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

HARRISON COMPANY LLC,

Plaintiff,

v.

A-Z WHOLESALERS INC. and

BARKAT G. ALI,

Defendants.

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CIVIL ACTION NO. 3:19-CV-1057-B

SECOND JOINT NOTICE OF AGREEMENT TO EXTEND DISCOVERY DEADLINE

Plaintiff Harrison Company LLC (“Plaintiff”), and Defendants A-Z Wholesalers Inc. and Barkat G. Ali (collectively, “Defendants”), file this Joint Notice of Agreement to Extend Discovery Deadline, pursuant to Paragraph 5 of the Court’s Scheduling Order (Doc. 9), and state:

1. Pursuant to the Court’s Scheduling Order (Doc. 9) and the parties first Joint Notice of Agreement to Extend Discovery Deadline (Doc. 46), the parties are to complete discovery by July 24, 2020. The parties hereby notify the Court that the parties have agreed to extend the time to complete depositions until 30 days after the Court rules on the parties’ cross-motions for summary judgment (*See* Docs. 51-53 and Docs. 54-57) (the “Cross-Motions”).

2. Plaintiff’s counsel and Defendants’ counsel discussed the need to extend the time to complete depositions to avoid potential waste, given the Cross-Motions, which could render the need for any deposition moot. Furthermore, due to limitations resulting from the COVID-19 pandemic, Defendants’ counsel in unable to effectively prepare witnesses.

3. Accordingly, the parties have agreed to extend the time to complete depositions until 30 days after the Court rules on the parties' cross-motions for summary judgment. Because the Court continued the trial pending the Court's resolution of the Cross-Motions (Doc. 59), no other deadlines are affected by this agreement. The only other outstanding deadlines are pre-trial submission deadlines, and the parties understand the continuance of the trial to continue those deadlines, as requested in their agreed motion (*see* Doc. 58, ¶ 10).

Respectfully submitted,

/s/ Joseph A. Unis, Jr.

David L. Swanson

State Bar No. 19554525

dswanson@lockelord.com

Joseph A. Unis, Jr.

State Bar No. 24075625

junis@lockelord.com

Anna K. Finger

State Bar No. 24105860

anna.k.finger@lockelord.com

LOCKE LORD LLP

2200 Ross Avenue, Suite 2800

Dallas, Texas 75201-6776

T: 214-740-8000

F: 214-740-8800

**ATTORNEYS FOR PLAINTIFF
HARRISON COMPANY, L.L.C.**

/s/ Joyce Lindauer

Joyce W. Lindauer

State Bar No. 21555700

joyce@joycelindauer.com

Guy Harvey Holman

State Bar No. 24095171

guy@joycelindauer.com

**JOYCE W. LINDAUER ATTORNEY,
PLLC**

1412 Main Street., Suite 500

Dallas, Texas 75202

T: (972) 503-4033

F: (972) 503-4034

ATTORNEYS FOR DEFENDANTS

CERTIFICATE OF SERVICE

I certify that on July 10, 2020, I served this document on all counsel of record via the ECF system and/or email.

/s/ Joseph A. Unis, Jr.
Counsel for Plaintiff